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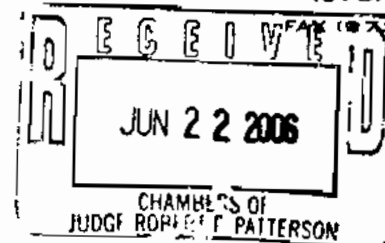
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June 22, 2006

**VIA FACSIMILE**

Honorable Robert P. Patterson, USDJ  
 United States District Court  
 Southern District of New York  
 500 Pearl Street  
 New York, New York 10007

**MEMO ENDORSEMENT**

Re: Local 100 Transport Workers Union et al. v. Bernard Rosen et al.  
 06 Civ. 4787 (RPP)

Dear Judge Patterson:

We represent the plaintiffs in the above-referenced case. Yesterday, the Court issued an Order to Show Cause, which denied plaintiffs' request for a restraining order. Nevertheless, the Order directed plaintiffs to post security in the amount of \$20,000.00

We are writing to respectfully request that the Court reconsider that portion of the Order. We recognize that under Rule 65(c), "No restraining order or preliminary injunction shall issue except upon the giving of security by the applicant. . . ." However, in this case, since there was no restraining order or preliminary injunction issued, plaintiffs suggest that such security may not be necessary.

Accordingly, we respectfully request that the Court reconsider that portion of Order. Thank you for your attention to this matter.

Respectfully submitted,

BROACH & STULBERG, LLP

By: Ira Cure

IC/ps

cc: Mark Brossman, Esq. (via facsimile)  
 Scott Gold, Esq. (via facsimile)  
 Walter Meginniss, Esq.

**SEE TYPEWRITTEN MEMO  
 ENDORSEMENT ATTACHED**

*Application granted  
 Plaintiff may proceed without  
 posting a bond.  
 So ordered  
 R. Patterson, J. USDJ*

**Case:** Local 100, Transport Workers Union, et al. v. Bernard Rosen, et al.  
**Index No.** 06 Civ. 4787 (RPP)

**MEMO ENDORSEMENT READS:**

*Application granted. Plaintiffs may proceed without posting a bond.*

*So ordered.*

*Robert P. Patterson, Jr., U.S.D.J., 6/22/06*